

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

DAVID FREDERICK RALLS, JR.,

Debtor.

Chapter 13

Case No. 24-12228 (AMC)

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned appears in the above-captioned Chapter 13 case as counsel to Franklin Mint Federal Credit Union (the “Client”) and, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, hereby requests that all notices given or required to be given and all papers served or required to be served in this Chapter 13 case be delivered and served upon the Client at the address of its counsel as set forth below:

Corinne Samler Brennan, Esquire  
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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all notices and pleadings referred to in the above-mentioned Federal Rules of Bankruptcy Procedure, together with all orders and notices of applications, motions, petitions, pleadings, complaints or other documents which in any way affect the debtor or his property.

The foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or

oral, and whether transmitted or conveyed by mail, delivery, telephone, telecopy, telegraph, telex or otherwise filed or made with regard to the above-referenced case and all proceedings therein.

Nothing contained herein shall be deemed or construed to be a waiver of any of the rights of the Client, including, without limitation, to (i) have final orders in non-core matters entered only after *de novo* review by a higher court, (ii) trial by jury in any proceeding so triable in this case, or any case, controversy, or adversary proceeding related to this case, (iii) have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Client may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

KLEHR | HARRISON | HARVEY |  
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*Counsel to Franklin Mint Federal Credit  
Union*

Dated: July 19, 2024